

**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP**  
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July 1, 2021

**By Electronic Mail and First Class Mail**

Ms. Sheri L. Bianchin  
 Remedial Project Manager  
 Institutional Controls Coordinator  
 U.S. Environmental Protection Agency Region 5  
 77 West Jackson Boulevard (SR-6J)  
 Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois**  
**Consent Decree – Quarterly Progress Report 62 (April-June 2021)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from April-June 2021.

**1. Actions Taken During Previous Quarter to Comply with the Consent Decree:**

- **Institutional Controls:** During the April-June 2021 period, the Group continued to perform title searches for use with 10 draft environmental covenants, including the draft environmental covenants for the 1555 State Street property; the Unknown Road (Taracorp) property; the [REDACTED] Non-responsive [REDACTED]; the Taracorp pile property; the Mayco (Illinois), LLC property; the Terminal Railroad Association property; the U.S. Carriers Inc. property; the Transload Realty property; and the [REDACTED] Non-responsive [REDACTED].
- **Remote Fill Properties:** During the April-May 2021 period, the Group continued to prepare an outline/protocol for soil sampling on several remote fill properties. The Group's project coordinator sent a letter to EPA on May 26, 2021 to provide the Group's Scope of Work for Soil Sampling on Remote Fill Properties.
- **Operation and Maintenance:** During the April-June 2021 period, the Group's project coordinator continued to prepare a revised Operation and Maintenance Plan to update the Group's 2002 Operation and Maintenance Plan. In addition, the following operation and maintenance activities were performed at the site:

April 21	The Group's project coordinator spoke to the Granite City Sanitation Department in regard to the Group's 2021 plans for cutting and maintaining vegetation on the Taracorp pile and 1555 State Street property.
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April 27	The Group's lawn maintenance contractor, Munie Greencare Professionals ("Munie"), cut the vegetation on the 1555 State Street property and flat portions of the Taracorp pile property.
June 8	The Group's project coordinator spoke to Munie's project manager regarding Munie's schedule for cutting the vegetation on the flat parts of the 1555 State Street and Taracorp pile properties.
June 15	Munie treated weeds with herbicide and cut them in the area along the fence and sidewalk on the 1555 State Street property.
June 15	The Group's project coordinator sent an email to All Pallet Services to request that they straighten some bent fence, repair a separated fence post, and repair some broken barbed wire that were observed during the operation and maintenance inspection along the south side of the Taracorp pile property.
June 16	The Group's project coordinator requested that Munie provide an update regarding its schedule for cutting the vegetation on the flat parts of the 1555 State Street and Taracorp pile properties.
June 16	The Group's project coordinator updated the Granite City Sanitation Department in regard to Munie's schedule for cutting the vegetation on the flat parts of the 1555 State Street and Taracorp pile properties.
June 16	Munie cut the vegetation on the flat parts of the 1555 State Street and Taracorp pile properties at the main industrial site.

- **Project Coordination:** During the April-June 2021 period and in addition to items previously noted, the Group's project coordinator performed the following work related to the site:

April 1	Submitted Quarterly Progress Report 61 to EPA.
May 26	Submitted a letter to EPA that included the Group's Scope of Work for Soil Sampling on Remote Fill Properties.
June 1	Sent an email to advise Beelman River Terminals regarding the schedule for the operation and maintenance inspection on June 8, 2021.
June 8	Performed an operation and maintenance inspection at the site.
June 15	Sent an email to EPA's project manager to request an update in regard to the Group's Petition for Partial Deletion.
June 21	Sent a letter to EPA to provide log sheets and photographs documenting the results of the June 8, 2021 operation and maintenance inspection at the site.
June 22	Sent an email to Beelman River Terminals' representatives to provide excerpts from the June 2021 operation and maintenance inspection report related to Slough Road.

## 2. Summary of Data and/or Results of Sampling and Tests Received:

- Not applicable for this reporting period.

**3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:**

- As indicated above, the Group submitted the Scope of Work for Soil Sampling on Remote Fill Properties to EPA in May 2021.

**4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- The Group will continue to perform operation and maintenance activities at the site, as required. As part of those activities, the Group will continue to prepare an updated operation and maintenance plan.
- The Group will continue to monitor All Pallet Services' efforts to repair the fence along the south side of the Taracorp pile.
- The Group will address comments or questions, if any are received from EPA, on the Scope of Work for Soil Sampling on Remote Fill Properties.
- The Group will continue to perform title searches, as part of efforts to finalize environmental covenants.
- The Group will address comments and questions, if any are received from EPA, on the Petition for Partial Deletion from the National Priorities List, which was submitted to EPA in March 2021.
- The Group will address comments, if any are received, on the draft administrative records, draft notices of soil contamination, and draft notices of potential soil contamination for 15 denied access residential properties that were submitted to EPA and Illinois EPA in September 2019 and October 2020.
- The Group anticipates that additional discussions will occur with the Venice attorney in regard to the Venice roadways ordinance.
- The Group will continue to address EPA's comments, update the Institutional Controls Work Plan, and implement institutional controls as the scope of institutional controls activities are finalized.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA in February 2019 to document the results of the November 2018 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April-May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and

Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties [REDACTED]

[REDACTED] in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties [REDACTED] Non-responsive [REDACTED] in August 2016.

**5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- Not applicable for this reporting period.

**6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

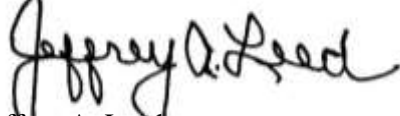
- Not applicable for this reporting period.

**7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,  
MONTROSE AGC

  
Jeffrey A. Leed  
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Mr. Brian Conrath – Illinois EPA (by electronic mail and first class mail)  
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)